

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MICHIGAN

JOHANNES M. PLOEG and  
HIEN DAO PLOEG,

Plaintiffs,

vs.

JENKINS ESTATES LTD and  
DAVID JON JENKINS

Defendants.

Case No.: 1:24-cv-00089

Hon. Paul L. Maloney

**ORAL ARGUMENT REQUESTED**

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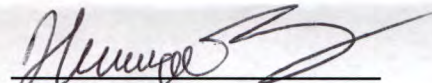
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**PLAINTIFF HIEN DAO PLOEG'S MOTION FOR AND IN SUPPORT OF**  
**PLAINTIFF JOHANNES M PLOEG'S MOTION FOR A PRELIMINARY**  
**INJUNCTION**

Hien Dao Ploeg, Plaintiff, hereby moves pursuant to Federal Rule of Civil Procedure 65 for a preliminary injunction ordering Defendants' to pay into the court the Builder Trust Funds paid by Plaintiff to Defendants and order Defendants to bond off or otherwise remove liens filed by materialmen against Plaintiff's home until this Court has an opportunity to issue a final judgment on the merits.

Plaintiffs incorporate the facts within her verified complaint filed on January 30, 2024. (ECF No. 1) and incorporates Plaintiff Johannes M. Ploeg's Amended Motion, and exhibits, for preliminary injunction filed on March 25, 2024. (ECF No. 18).

Plaintiff makes this motion for preliminary injunction on the grounds that (1) Plaintiffs have demonstrated a likelihood of succeeding on the merits of their claim; (2) Plaintiffs are likely to suffer irreparable harm in the absence of the relief requested; (3) the harm Plaintiffs are likely to suffer if the preliminary injunction is denied outweighs the harm that Defendants are likely to suffer as a result of the preliminary injunction; and (4) the public interest favors issuing the preliminary injunction.

  
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DATED: March 26, 2024

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing has been filed on March 26, I served this motion on Defendant through his attorney via U.S. First Class Mail and to co-plaintiff via hand delivery.

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**CERTIFICATE OF COMPLIANCE**

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